

Message

From: Laura Jensen [ljensen@rouxinc.com]
Sent: 7/17/2018 6:35:37 PM
To: Cirian, Mike [Cirian.Mike@epa.gov]
CC: Gunnar Emilsson [EmilssonGR@cdmsmith.com]; Sanchez, Brian [sanchez.brian@epa.gov]; Berry, David [Berry.David@epa.gov]; John.Stroiazzo@glencore.ca; Steve Wright - CFAC [swright@cfaluminum.com]; Skipper, Sherry [Skipper.Sherry@epa.gov]; Dick Sloan [rsloan@mt.gov]; Andrew Baris [abaris@rouxinc.com]; Roux IT [mritorto@rouxinc.com]; Erin Formanek [Formanekek@cdmsmith.com]; Lynn Woodbury [woodburyl@cdmsmith.com]
Subject: RE: Expedited Risk Assessment for South Percolation Ponds Path Forward

Thank you, Mike.

From: Cirian, Mike [mailto:Cirian.Mike@epa.gov]
Sent: Tuesday, July 17, 2018 2:28 PM
To: Laura Jensen [ljensen@rouxinc.com]
Cc: Gunnar Emilsson <EmilssonGR@cdmsmith.com>; Sanchez, Brian <sanchez.brian@epa.gov>; Berry, David <Berry.David@epa.gov>; John.Stroiazzo@glencore.ca; Steve Wright - CFAC <swright@cfaluminum.com>; Skipper, Sherry <Skipper.Sherry@epa.gov>; Dick Sloan <rsloan@mt.gov>; Andrew Baris <abaris@rouxinc.com>; Michael Ritorto <mritorto@rouxinc.com>; Erin Formanek <Formanekek@cdmsmith.com>; Lynn Woodbury <woodburyl@cdmsmith.com>
Subject: RE: Expedited Risk Assessment for South Percolation Ponds Path Forward

Hello Laura,

As a followup to your email below, the EPA concurs that CFAC/Roux proceeds with the risk assessment for the South Percolation Ponds Area as part of the overall BHHRA and BERA for the Site, rather than submit a separate technical memorandum.

Thanks,
Mike

Mike Cirian, PE
Libby On-site Project Manager
US EPA
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Libby, MT 59923
(406) 293-6194 Office

From: Laura Jensen [mailto:ljensen@rouxinc.com]
Sent: Friday, June 29, 2018 9:04 AM
To: Cirian, Mike <Cirian.Mike@epa.gov>
Cc: Gunnar Emilsson <EmilssonGR@cdmsmith.com>; Sanchez, Brian <sanchez.brian@epa.gov>; Berry, David <Berry.David@epa.gov>; John.Stroiazzo@glencore.ca; Steve Wright - CFAC <swright@cfaluminum.com>; Skipper, Sherry <Skipper.Sherry@epa.gov>; Dick Sloan <rsloan@mt.gov>; Andrew Baris <abaris@rouxinc.com>; Roux IT <mritorto@rouxinc.com>
Subject: Expedited Risk Assessment for South Percolation Ponds Path Forward

Mr. Cirian,

As previously discussed with USEPA/MDEQ, CFAC/Roux proposed an expedited risk assessment of the South Percolation Pond Area in a letter to the USEPA dated September 6, 2017 and a subsequent Expedited Risk Assessment Sampling and Analysis Plan (Expedited Risk Assessment SAP) dated October 20, 2017. The objective of the expedited risk assessment was to develop a better understanding of environmental conditions in the South Percolation Pond Area, and any human health or ecological risks that may be associated with its current condition, on an expedited time frame due to the upcoming high-water conditions because the full baseline risk assessment as part of the RI/FS will not be completed until mid-2019 at the earliest.

Roux conducted soil, sediment, and surface water sampling activities in and around the South Percolation Ponds and Backwater Seep Sampling Area in accordance with the Expedited Risk Assessment SAP in October and November 2017. The draft sampling results from the Expedited Risk Assessment were provided to the USEPA on March 16, 2018 via email correspondence. CFAC also acted in December 2017 to stabilize the South Ponds dam via installation of additional engineering controls, which was not part of the RI/FS. These controls performed well during the recent high-water season, which appears to have obviated the need for expediting the South Percolation Pond Area risk assessment.

Separately, during the comment and response period on the draft Baseline Human Health Risk Assessment Work Plan (BHHRA WP) and draft Baseline Ecological Risk Assessment Work Plan (BERA WP), it has been agreed that interim risk assessment deliverables to support risk assessment assumptions will be prepared for USEPA review and approval. These interim deliverables are proposed to be submitted to USEPA for review in the third quarter of 2018. The assumptions contained in those interim deliverables will be integral to the overall risk assessment, including the South Percolation Ponds Area.

As described in the Expedited Risk Assessment SAP, CFAC/Roux proposed to submit a technical memorandum to USEPA documenting the results of the expedited risk assessment; and following USEPA approval, this deliverable was subsequently added to the project schedule included with the monthly progress reports. However, based upon the current status of the project and progression of the overall risk assessment as noted above, Roux believes it would be technically appropriate and a more efficient use of resources to remove the technical memorandum from the schedule; and instead document the results of the expedited risk assessment in conjunction with the overall risk assessment for the Site.

Based upon the above, CFAC/Roux propose to address the risk assessment for the South Percolation Ponds Area as part of the overall BHHRA and BERA for the Site, rather than submit a separate technical memorandum.

Please let us know if you concur with the above described approach and please let us know if you have any questions.

Laura Jensen, P.G. – NY | Project Hydrogeologist

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